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January 21, 2016

Via ECF & Facsimile

Honorable George B. Daniels
United States District Judge
Southern District of New York
500 Pearl Street, Room 1310
New York, NY 10007
Fax: (212) 805-6737

Re: *Mary Ellen Toohey v. Portfolio Recovery Associates, LLC, et al.*
Case No. 15-CV-8098 (GBD)
Request to Modify Briefing Schedule for Defendants' Motions to Dismiss

Dear Judge Daniels:

This firm represents defendant Malen & Associates, P.C. (the "Malen Firm") in the above matter. We write on behalf of all Defendants, and with the consent of Plaintiff's counsel, to request that this Court modify the briefing schedule for Defendants' respective motions to dismiss (Docket Nos. 20 & 25) so as to allow Defendants to file their reply papers on February 3, 2016. Under the current briefing schedule (Docket No. 32), replies are due by January 27, 2016.

The parties had previously discussed and agreed to a two-week period, rather than a one-week period, for the submission of replies when Defendants agreed to extend Plaintiff's time to respond to Defendants' motions to dismiss. The inclusion of the January 27, 2016 date, rather than the February 3, 2016 date, in the proposed Civil Case Management Plan was an oversight.

We thank the Court for its consideration.

Very truly yours,

Kaufman Dolowich & Voluck, LLP

By:

Adam M. Marshall

cc: All Counsel of Record via ECF